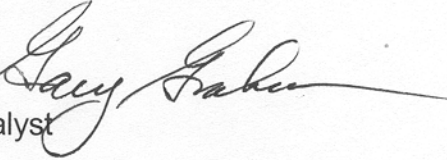


COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR DIVISION

INTRA AGENCY MEMORANDUM

TO: File

FROM: Gary Graham
Regulatory Analyst



SUBJECT: Meeting Minutes - Regulatory Ad Hoc Advisory Group Concerning Permits
for New and Modified Sources (Rev. H05)

DATE: March 21, 2006

INTRODUCTION

At 10:00 a.m., March 15, 2006, the third meeting of the ad hoc advisory group concerning permits for new and modified sources (minor new source review) was held in the Third Floor Conference Room, Department of Environmental Quality, 629 East Main Street, Richmond, Virginia. A record of meeting attendees is included as Attachment A.

SUMMARY OF DISCUSSION

1. The members attending the meeting discussed the remainder of the issues identified at the January 24, 2006 except for the issues relating to meeting the statutory legislative notification requirement and any additional revisions necessary to implement MACT provisions in the context of Chapter 80, Article 6 (minor new source review):
 - a) Tentatively, consensus was reached that "debottlenecked" units should not be subject to BACT. There was no consensus reached during this meeting on whether or not emissions from "debottlenecked" units should be used for Minor NSR permit applicability.
 - b) Tentatively, consensus was reached concerning the issue of revising regulatory language to annotate each reference with a subsection title or the entire text of the regulation referred to. Those present felt that all of the alternatives offered would adversely impact the readability and clarity of the regulation and none of the alternatives that were offered would resolve the problems articulated. The agency will continue to investigate to see if other alternatives could do better.
 - c) The group discussed whether exemptions could be created for temporary emissions units and process trials, however, no ideas for how to do this other than using the existing exemptions were offered. However, it was suggested that General Permits might accomplish the need for speed. That option is planned to be discussed

a later meeting providing that there is time remaining to address it.

d) Discussion concerning ways to involve the public in exemption decisions, particularly with respect to relocating portable emissions units, produced no consensus.

e) Discussion concerning the feasibility of placing Title V compliance certification requirements into Article 6 produced a tentative consensus that it was not necessary to do so, as long as the Department was willing to put some "fair warning" language either in the cover letter to NSR permits for sources subject to a Title V permit, or in the permit. The Department will investigate how to best serve this consensus condition.

2. Discussion of the remainder of the changes to the DRAFT H05 revision handed out at an earlier meeting produced consensus on many of the changes in the draft and rejection of a few of them. The discussion also highlighted problems with a few other changes which will require additional thought. Discussion concerning changes necessary to best way to treat "debottlenecked" emissions units and the exemption requirements by emissions rates was deferred until the Department could propose another DRAFT of Revision H05 to take previous discussions into account.

The group agreed to follow up on the remaining issues at either the next meeting or the following meeting of the ad hoc advisory group.

DOCUMENT DISTRIBUTION

The following documents were distributed to the group prior to or at the meeting:

1. Agenda for the March 15, 2006 meeting.
2. A copy of an email to the other members of the group from Mr. Jaffe, one of the members absent, dated March 15, 2006, concerning an exemption for "debottlenecked" emissions units.
3. Final minutes of the March 8, 2006 meeting.
4. A copy of an email from Mr. Cline, one of the members, to Mr. Turner, another of the members, dated March 13, 2006 concerning issues to be worked out by the group.
5. An undated copy of a short discussion titled "Clear Statements of Article 6 Non-applicability to 'Debottlenecked Emissions Units'" by Mr. Cline.

TEMPLATES\PROPOSED\AH08
REG\DEV\H05-AH08-3

Attachments

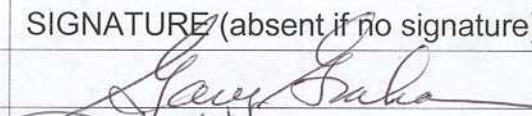


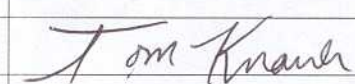
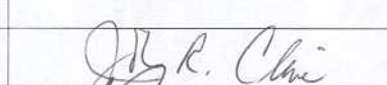
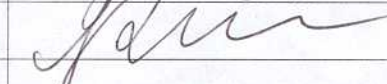
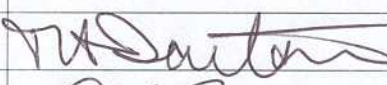
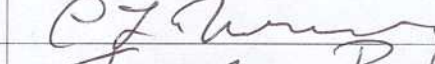
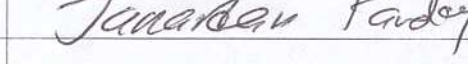
**COMMONWEALTH OF VIRGINIA
STATE AIR POLLUTION CONTROL BOARD**

**AD HOC GROUP MEETING
ATTENDANCE RECORD**

March 15, 2006

SUBJECT: Permits for New and Modified Sources (Revision H05)

LOCATION: Third Floor Conference Room, Department of Environmental Quality, 629 East Main Street, Richmond, Virginia

PRINTED NAME	SIGNATURE (absent if no signature)
Gary Graham	
Dan Holmes	
Andy Gates	
Bob Asplund (alternate)	(absent)
Tom Knauer	
Cale Jaffe	(absent)
John Cline	
Bob Mann	
Richard Rasmussen	(absent)
Terry Darton	
Chuck Turner	
Janardan Pandey	
Non-members Printed Name:	
Jaime Bauer (DEQ APS)	